

**GEORGE K. CHEBAT (034232)**

George@EnaraLaw.com

**JOSEPH J. TOBONI (031385)**

Joseph@EnaraLaw.com

**DANIEL DE JULIO (035854)**

Danny@Enaralaw.com

**Enara Law PLLC**

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Telephone: (602) 687-2010

[Filings@EnaraLaw.com](mailto:Filings@EnaraLaw.com)

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

Valentino Dimitrov, individually, and on  
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota  
corporation; Stavatti Aerospace, Ltd, a  
Wyoming corporation; Stavatti  
Corporation, a Minnesota corporation;  
Stavatti Immobiliare, Ltd, a Wyoming  
corporation; Stavatti Industries, Ltd, a  
Wyoming corporation; Stavatti Niagara,  
Ltd., a New York corporation; Stavatti  
Super Fulcrum, Ltd, a Wyoming  
corporation; Stavatti Ukraine, a Ukrainian  
business entity; Stavatti Heavy Industries  
Ltd, a Hawaii corporation; Christopher  
Beskar and Maja Beskar, husband and  
wife; Brian Colvin and Corrina Colvin,  
husband and wife; John Simon and Jean  
Simon, husband and wife; William Mcewn  
and Patricia Mcewen, husband wife; Rudy  
Chacon and Jane Doe Chacon, husband  
and wife; and DOES 1 through 10,  
inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S MOTION FOR ENTRY  
OF DEFAULT JUDGMENT AGAINST  
STAVATTI CORPORATION,  
CHRISTOPHER BESKAR, PATRICIA  
MCEWEN, WILLIAM MCEWEN AND  
JEAN SIMON**

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requested a default judgment against  
2 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar; Patricia  
3 Mcewen and William Mcewen, husband and wife; and Jean Simon (collectively,  
4 “Defendants”). The Clerk of the Court entered the Defendants’ default pursuant to Fed.  
5 R. Civ. P. 55(a). The Court, having examined the pleadings and the record, and for good  
6 cause appearing, finds that the Plaintiff’s request is well-founded and should be granted.

7 **IT IS THEREFORE ORDERED** that Plaintiff is awarded judgment against  
8 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar; Patricia  
9 Mcewen and William Mcewen, husband and wife; and Jean Simon as follows:

- 10 A. For an award of Plaintiff’s breach of contract damages of \$6,000,000 for which  
11 Defendants Stavatti Corporation, a Minnesota Corporation; Christopher  
12 Beskar; Patricia Mcewen and William Mcewen, husband and wife; and Jean  
13 Simon shall be jointly and severally liable;
- 14 B. For Plaintiff’s attorneys’ fees and costs, a motion for attorneys’ fees and costs  
15 will be filed pursuant to LRCiv 54.2;
- 16 C. For post judgment interest on the above amounts at a rate of 10% per annum;  
17 and
- 18 D. For Plaintiff’s attorneys’ fees and costs incurred in enforcing this judgment.

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20 **DATED** this \_\_\_\_\_ day of \_\_\_\_\_ 2023.

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